

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
WINCHESTER DIVISION**

ASHTON HUGHES,)	
JOSHUA VANDUSEN,)	
SHANNON HELMERS, and)	
CHARLES DODSON,)	Case No. 4:19-cv-00028-CLC-SKL
)	
Plaintiffs,)	JURY DEMAND
)	
v.)	JUDGE COLLIER
)	MAGISTRATE JUDGE LEE
DENISE JACKSON and)	
RVSHARE, LLC,)	
)	
Defendants.)	
)	
DENISE JACKSON,)	
)	
Counter-Plaintiff,)	
)	
v.)	
)	
ASHTON HUGHES,)	
)	
Counter-Defendant.)	

**JOINT MOTION TO EXTEND DEADLINES TO DISCLOSE EXPERTS,
SERVE FINAL WITNESS LISTS, AND COMPLETE DISCOVERY**

Plaintiffs, Ashton Hughes, Joshua VanDusen, Shannon Helmers, and Charles Dodson, and Defendants, Denise Jackson and RVshare, LLC (collectively, the “Parties”), respectfully move the Court to extend the deadlines for the Parties to disclose experts, serve their final witness lists, and complete discovery, as set out in the Scheduling Order (Dkt. 47) and the Agreed Order Granting Joint Motion to Extend Deadlines to Disclose Experts and Serve Final Witness Lists (Dkt. 64). Under those Orders, Defendants were to disclose expert testimony by October 29, 2020; the Parties were to provide final witness lists by November 13, 2020 (and

supplement as necessary within seven days, or by November 20, 2020); and the Parties were to complete discovery by December 18, 2020.

Due in large part to the COVID-19 pandemic, the Parties agree that additional time is required to meet these deadlines and request that the Court extend the deadline for Defendants to disclose expert testimony to December 4, 2020; extend the deadline for the Parties to provide final witness lists to December 14, 2020 (and supplementation as necessary within seven days, or by December 21, 2020); and extend the deadline to complete discovery to January 29, 2021.

Concerning Defendants' disclosure of expert testimony, Plaintiffs requested (and Defendants agreed) to provide additional time for Plaintiffs to disclose expert testimony. Plaintiffs likewise agreed to provide additional time for Defendants to disclose expert testimony.

Trial is not set until May 10, 2021. No other deadlines, including the trial date, will be affected by these extensions.

The Parties request that the Court enter the proposed order attached hereto as Exhibit A.

Respectfully submitted,

NEAL & HARWELL, PLC

By: /s/ Benjamin C. Aaron

Philip N. Elbert, No. 009430

Jeffrey A. Zager, No. 032451

Benjamin C. Aaron, No. 034118

1201 Demonbreun Street, Suite 1000

Nashville, TN 37203

(615) 244-1713 – Telephone

(615) 726-0573 – Facsimile

pelbert@nealharwell.com

jzager@nealharwell.com

baaron@nealharwell.com

Counsel for Plaintiffs

LUTHER-ANDERSON, PLLP

By: /s/ Gerard M. Siciliano (with permission)

GERARD M. SICILIANO, BPR # 9647

ALAN C. BLOUNT, BPR # 035048

100 W. Martin Luther King Blvd Ste 700

P. O. Box 151

Chattanooga, TN 37401-0151

(423) 756-5034

Attorneys for Denise Jackson

COPELAND, STAIR, KINGMA & LOVELL, LLP

/s/ G. Graham Thompson (with permission)

ANGELA CIRINA KOPET, BPR 017921

G. GRAHAM THOMPSON, BPR 034467

735 Broad Street, Suite 1204

Chattanooga, TN 37402

Phone: 423-713-7075

Fax: 423-648-2283

Counsel for RVShare, LLC